

Aaron C. Gross, Esq. (AG-0498)
SOBEL PEVZNER, LLC
Attorneys for Defendants:
KENAN ADVANTAGE GROUP, INC. i/s/h/a
THE KENAN ADVANTAGE GROUP INC.,
JAMES MAGUIRE and KAG LEASING, INC.
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File No.: KA-15867
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ARIEL PRICE,

Plaintiff,

- against -

THE KENAN ADVANTAGE GROUP INC., KENAN
ADVANTAGE GROUP INC., JAMES MAGUIRE and
KAG LEASING INC.,

Defendants.
-----X

Civil Action No.:

NOTICE OF REMOVAL

TO: LAW OFFICE OF
MICHAEL JAMES PRISCO, PLLC
Michael J. Prisco, Esq.
Attorneys for Plaintiff:
ARIEL PRICE
3280 Sunrise Highway, #64
Wantagh, NY 11793
Tel: 718-709-9678

PLEASE TAKE NOTICE that pursuant to 28 U.S.C., Section 1441, defendants,
KENAN ADVANTAGE GROUP, INC. i/s/h/a THE KENAN ADVANTAGE GROUP, INC.,
JAMES MAGUIRE and KAG LEASING, INC. (the "Removing Defendants"), hereby
remove this action from the Supreme Court of the State of New York, County of Bronx, to

the United States District Court for the Southern District of New York. The Removing Defendants appear solely for the purpose of removal and for no other purpose, reserving all other defenses available to them, and allege as follows:

1. The defendant, KENAN ADVANTAGE GROUP, INC., is an authorized foreign corporation with its principal place of business at 4366 Mt. Pleasant St NW, North Canton, OH 44720.

2. The defendant, KAG LEASING, INC., is an authorized foreign corporation with its principal place of business at 4366 Mt. Pleasant St NW, North Canton, OH 44720.

3. The defendant, JAMES MAGUIRE, is a resident of Pennsylvania.

4. The plaintiff, ARIEL PRICE, is a resident of Bronx County, New York, and resides at 1691 Eastburn Avenue, Bronx, New York 10457.

5. This Notice of Removal is being filed within thirty (30) days after receipt by the Removing Defendants of plaintiff's Response to Demand for Damages, dated September 6, 2022, and thus is timely filed pursuant to 28 U.S.C., Section 1446(b). A copy of plaintiff's Response to Demand for Damages is annexed hereto as **Exhibit "A."**

6. In compliance with 28 U.S.C. Section 1446(a) annexed hereto as **Exhibit "B"** is a copy of the plaintiff's Summons and Complaint dated May 27, 2022.

7. The Removing Defendants responded to plaintiff's Summons and Complaint by service of a Verified Answer and Combined Discovery Demands, on July 7, 2022, including a Demand for Damages. See **Exhibit "C"** annexed hereto, which constitutes all pleadings served upon the parties herein.

6. The plaintiff in this action seeks to recover a sum in an amount in excess of the upper monetary jurisdictional limit of all lower courts, in compensation for personal

injuries which allegedly occurred on or about the 4th day of November, 2021, while the plaintiff was operating a motor vehicle at or near Ittner Place and Webster Avenue, Bronx, New York.

7. Jurisdiction in the United States District Court is founded upon 28 U.S.C. Section 1332(a) as there exists diversity of citizenship between the parties and the sum sought by the plaintiff exceeds Seventy-Five Thousand (\$75,000.00) Dollars.

8. Removing Defendants will promptly file a copy of this Notice of Removal in the Supreme Court of the State of New York, County of Bronx, and will serve a copy of the same on the plaintiff in accordance with 28 U.S.C., Section 1446(3).

WHEREFORE, Removing Defendants, **KENAN ADVANTAGE GROUP, INC.** i/s/h/a **THE KENAN ADVANTAGE GROUP, INC., JAMES MAGUIRE and KAG LEASING, INC.**, give notice that the above-captioned action commenced against them in the Supreme Court of the State of New York, County of Kings, has been removed to this Court.

Dated: Huntington, New York
September 12, 2022


AARON C. GROSS (AG-0498)